UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

ECF CASE KLEIMAR, N.V.,

> Plaintiff. 16 CV 9486 (AJN) (DCF)

ANSWER OF against

GARNISHEE MACSTEEL

DALIAN DONGZHAN GROUP CO., LTD. INTERNATIONAL BENXI BEIYING IRON AND STEEL GROUP USA CORP. TO TENTH IMPORT AND EXPORT CORP. LTD., THROUGH TWENTIETH BEIGANG HONG KONG LIMITED, and **SERVED WRIT OF**

BEITAI IRON & STEEL GROUP CO., LTD., **GARNISHMENT BY**

KLEIMAR, N.V.

Defendants.

TO THE MARSHALL OF THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK:

Pursuant to Rule B(3)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure and in response to a certain Process of Maritime Attachment and Garnishment in the above-captioned matter dated January 9, 2017, and served upon Garnishee MACSTEEL INTERNATIONAL USA CORP. ("MACSTEEL") on or about February 24, 2017, February 27, 2017, February 28, 2017 March 1, 2017, March 2, 2017, March 3, 2017, March 6, 2017, March 7, 2017, March 8, 2017, March 9, 2017, and March 10, 2017, respectively, Garnishee MACSTEEL hereby states that on each such date of service, it was not indebted to the Defendants DALIAN DONGZHAN GROUP CO., LTD., BENXI BEIYING IRON AND STEEL GROUP, IMPORT AND EXPORT CORP. LTD., BEIGANG HONG KONG LIMITED, or BEITAI IRON & STEEL GROUP CO., LTD (collectively, "Defendants"), and did not otherwise have in its possession any property, tangible or intangible, including funds, assets, cash, good, chattels, credits, effects, debts, owed by or owed to the Defendant(s) or

monies to be paid to discharge a debt owed to the Defendant(s), including monies being transferred by, to or for the benefit of the Defendant(s).

Dated: New York, New York March 15, 2017

DLA PIPER LLP (US)

By: /s/ Neal Kronley
Kiera S. Gans
kiera.gans@dlapiper.com
Neal F. Kronley
neal.kronley@dlapiper.com
1251 Avenue of the Americas
New York, New York 10020
(212) 335-4500 (phone)
(212) 335-4501 (fax)

Attorneys for Garnishee Macsteel International USA Corp.

VERIFICATION

STATE OF NEW YORK)	
)	SS
COUNTY OF NEW YORK)	

Margo Rosner Marks, being duly sworn, deposes and says as follows:

I am the Managing Director for Macsteel International USA Corp. ("Macsteel"). I have reviewed the contents of the foregoing ANSWER OF GARNISHEE MACSTEEL INTERNATIONAL USA CORP. TO TENTH THROUGH TWENTIETH SERVED WRIT OF GARNISHMENT BY KLEIMAR, N.V. in Docket No. 16 Civ. 09486(AJN) and know the contents thereof and that the same are true to Macsteel's files, and communications with relevant employees of the company.

Margo Rosner Marks

Sworn to before me on

March 15, 2017

DINETAH FAITH SIMS

i Notary Public, State of New York

No. 02SI6346238

Qualified in Westchester County

Commission Expires August 8, 20.30

CERTIFICATE OF SERVICE

I, Neal Kronley, hereby certify that on the 15 day of March, 2017, I caused the foregoing ANSWER OF GARNISHEE MACSTEEL INTERNATIONAL USA CORP. TO TENTH THROUGH TWENTIETH SERVED WRIT OF GARNISHMENT BY KLEIMAR, N.V. to be served by ECF and email upon:

Kevin J. Lennon, Esq. LENNON, MURPHY & PHILLIPS, LLC 420 Lexington Avenue, Suite 300 New York, New York 10170 (212) 490-6050 (212) 490-6070 klennon@lmplaw.net Counsel for Plaintiff

/s/ Neal Kronley
Neal F. Kronley